

Mr. Scott Christensen
Koch Pipeline Company
1 Danuser Drive
Herman, Missouri 65041

Re: Exempt Operation Status, 069-12483-00020

Dear Mr. Christensen:

The application from Koch Pipeline Company, received on July 14, 2000, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following pipeline propane flaring operation located in Vigo County, Indiana, is classified as exempt from air pollution permit requirements:

The following exemption is the first air approval issued to this source:

- (a) Ammonia purging along the pipeline, using a propane flare as a control and exhausting to the atmosphere, limited to no more than twelve (12) one-hour purges of 1000 ft or less of pipeline, per year.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Management (OAM) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

ERG/RB

cc: File - Huntington County
U.S. EPA, Region V
Huntington Health Department
Air Compliance Section Inspector - Ryan Hillman
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Exemption

Source Background and Description

Source Name:	Koch Pipeline Company
Source Location:	1 Danuser Drive, Hermann, Missouri
County:	Huntington
SIC Code:	3564
Operation Permit No.:	069-12483-00020
Permit Reviewer:	ERG/RB

The Office of Air Management (OAM) has reviewed an application from Koch Pipeline Company relating to the operation of propane flare.

Emission Units and Pollution Control Equipment

The source consists of the following facilities/units:

Ammonia purging along the pipeline, using a propane flare as a control and exhausting to the atmosphere.

Source Definition

The 6" anhydrous ammonia pipeline runs from west central Indiana to Northern Indiana. Normal maintenance is performed on sections of the pipeline no more than 12 times a year. During these procedures, the ammonia is evacuated to a propane flare.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on July 14, 2000, with additional information received on October 11, 2000.

Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations are provided in Appendix A of this document (Pages 1 and 2).

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.” The assumption that the emissions could occur for 8,760 hours per year at multiple points along the pipeline would render the pipeline useless for its economic purpose (i.e., transport of ammonia). Instead, the potential to emit was calculated based on the maximum number of flaring episodes anticipated along the pipeline. Purging can occur anywhere along the pipeline and is not limited to valves, terminal operations, pump stations or LBOs.

Pollutant	Potential To Emit (tons/year)
PM	0.00
PM-10	0.00
SO ₂	0.00
VOC	0.41
CO	1.07
NO _x	0.19

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of criteria pollutants are less than 100 tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is less than twenty-five (25) tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.
- (c) The potential to emit criteria pollutants is less than five (5) tons per year, therefore, the source is exempt and subject to 326 IAC 2-5.1-1.

Actual Emissions

No previous emission data has been received from the source.

County Attainment Status

The pipeline has been constructed in Vigo, Montgomery, Tippacanoe, Clinton, Cass, Carroll, Howard, Miami, Wabash and Huntington Counties. For the purpose of this permit, Virgo County was used as the primary county based on the number of support facilities (terminals, pump stations and LBOs) resident in Vigo county. Note, that flaring can be needed anywhere along the pipeline in any of the counties where the pipeline has been constructed.

Pollutant	Status for Vigo County
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

All other counties are in attainment for all criteria pollutants. Note, since this is an exemption, purging can be performed in any of the counties where the pipeline has been constructed.

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. All counties that the pipeline is operating in have been designated as attainment for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) All counties where the pipeline operates have been classified as attainment or for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Source Status

- (a) This existing source is **not** a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This new source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons/year.

This is the first air approval issued to this source.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR art 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source's potential to emit all criteria is less than five (5) tons per year. The source is not one of the twenty-eight (28) listed sources and its potential to emit PM10 is less than one-hundred (100) tons per year including fugitive emissions, therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

Conclusion

The operation of this propane flaring operation shall be subject to the conditions of the attached proposed exemption 069-12482-00020.